

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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January 10, 2022

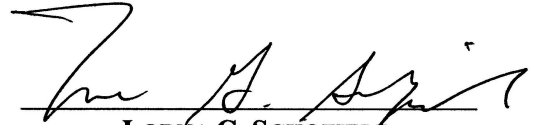
Via ECF

The Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

The parties are directed to confer, agree on and retain a physician to conduct an examination of Defendant to provide the Court with a second opinion about the impact of the location monitoring bracelet on Defendant's physical health. The parties shall file a joint status letter on or before **January 20, 2022**.

Dated: January 13, 2022
New York, New York

Re: **United States v. Willie Dennis**
20 Cr. 623 (LGS)



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield,

I write on behalf of Willie Dennis to respectfully request that the Court narrowly modify the conditions of Mr. Dennis's pretrial release in this matter. Specifically, given the nonexistent risk of flight or danger to the community that Mr. Dennis presents; the onerous conditions of Mr. Dennis's pretrial release; his full compliance to date with the terms of his pretrial release; and the significant physical pain and injury that Mr. Dennis has experienced as a result of his location monitoring equipment, we respectfully request that Mr. Dennis no longer be subject to home detention enforced by location monitoring, but rather to a curfew enforced by voice recognition technology. The Government and Pretrial Services oppose this request.

To the extent the Court does not grant this application on the basis of the parties' submissions, we respectfully request that the Court conduct a hearing at its earliest convenience to consider this request. Due to Mr. Dennis's residence in Florida, the widespread COVID outbreak, and Mr. Dennis's physical condition, the defense consents to a telephonic hearing. The parties are available Friday, January 14, 2022 from 1:00 to 4:00 p.m. for a telephone conference, and can make themselves available next week as well, depending on the Court's availability.

I. Background

A. Background

Willie Dennis was born and raised in New York, and grew up in a close-knit family with strong religious and family values. Mr. Dennis was the first African American student to attend St. Edwards the Confessor School in Syosset, New York, and attended Choate Rosemary Hall in Wallingford, Connecticut on a scholarship. Mr. Dennis then attended Columbia College, from